

# EXHIBIT J

**Implicit Networks, Inc. v. Juniper Networks, Inc.**

**Peter Alexander, Ph.D. - CONFIDENTIAL**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IMPLICIT NETWORKS, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. C 10-4234 SI
	)	
JUNIPER NETWORKS, INC.,	)	
	)	
Defendant.	)	
_____	)	

DEPOSITION OF: PETER ALEXANDER, Ph.D.  
TAKEN ON: October 16, 2012

13235

BEVERLY L. NEWMAN  
CSR No. 2872

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1 Viking software running on the Australia Series program. 01:26:37

2 So the Australia program is a set of different 01:26:43

3 hardware components, apparently, or hardware elements, 01:26:49

4 modular, and can be configured in various ways to 01:26:55

5 perform different product sets. 01:27:01

6 So in answer to your question, the Viking 01:27:02

7 software is apparently existing software that is already 01:27:05

8 available with this series of hardware elements, and the 01:27:12

9 intent of this document is to specify how intrusion 01:27:18

10 detection and prevention components will be added to 01:27:22

11 the -- to that particular hardware software combination. 01:27:27

12 BY MR. HOSIE: 01:27:31

13 Q Are you aware that Viking was a code name for a 01:27:33

14 project in development at Juniper? 01:27:36

15 MR. McPHIE: Objection. Assumes facts. 01:27:42

16 THE WITNESS: I was not particularly aware. I 01:27:45

17 was assuming that Viking was a code name because it 01:27:48

18 doesn't sound like a product name. And I don't think 01:27:51

19 I've seen it elsewhere. So I'll accept your word that 01:27:53

20 it was a code name for a product under development. 01:27:57

21 BY MR. HOSIE: 01:28:00

22 Q And what product was that? If you know. 01:28:00

23 A No, I don't know, except it has all the 01:28:05

24 appearance of being the IDP product. So I'm not sure. 01:28:09

25 Q You were not aware that Viking was the code 01:28:15

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1 name for the IDP -- I'm sorry. Viking was the code name 01:28:19

2 for what became the SRX line? 01:28:23

3 A That's correct. I was not aware of it. 01:28:26

4 Q All right, sir. What's a design specification? 01:28:28

5 MR. McPHIE: Objection. Vague and ambiguous. 01:28:32

6 THE WITNESS: Well, in the normal procedure for 01:28:36

7 software and hardware development, computer system 01:28:40

8 development, there's usually a requirements document 01:28:44

9 first, which is authored by the marketing department for 01:28:48

10 the product management. 01:28:53

11 That is later turned into or expanded out into 01:28:57

12 a functional specification, and then typically the 01:29:02

13 engineering department writes a design document, which 01:29:06

14 is the design specification for the implementation of 01:29:10

15 the product according to the functional spec. 01:29:14

16 BY MR. HOSIE: 01:29:17

17 Q Would you consider Juniper's design 01:29:18

18 specification for the SRX products as authoritative 01:29:20

19 evidence on how those products work? 01:29:26

20 MR. McPHIE: Objection. Vague and ambiguous. 01:29:28

21 THE WITNESS: In my experience, the design 01:29:32

22 specification is done before the development begins 01:29:34

23 based on the functional specification, but as the 01:29:39

24 development progresses, changes are forced on the 01:29:44

25 design. 01:29:49

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1           So the answer would be it depends which version   01:30:01  
2   of the design specification we are dealing with and what   01:30:01  
3   point in time relative to release of the product it       01:30:01  
4   pertained to.   01:30:06

5           And further than that, sometimes engineers       01:30:08  
6   don't bother to upgrade or update the design           01:30:11  
7   specifications. So it may be the initial design       01:30:14  
8   specification, in which case I wouldn't treat it as       01:30:18  
9   absolutely authoritative.                                   01:30:21

10   BY MR. HOSIE:   01:30:22

11       Q   Do you know what Krishna said about whether     01:30:23  
12   this was reliable evidence of how the SRX functioned?   01:30:26

13       A   I don't recall.                                     01:30:31

14       Q   All right, sir. Please turn to the page that     01:30:31  
15   ends 4322.   01:30:33

16       A   Yes.   01:30:49

17       Q   So the Juniper SRX 3000 and 5000 boxes have IDP   01:30:50  
18   built in. Is that true or false?                         01:30:58

19           MR. McPHIE: Objection. Compound.               01:31:02

20           MR. HOSIE: Let me rephrase.                     01:31:03

21       Q   Does the SRX 5800 come with IDP functionality   01:31:04  
22   built in?   01:31:10

23           MR. McPHIE: Objection. Vague and ambiguous.     01:31:11

24           THE WITNESS: I don't know whether it -- I'd     01:31:18  
25   use the term built-in. It may be capable of that, but I   01:31:20

## REPORTER'S CERTIFICATE

I, BEVERLY L. NEWMAN, CSR No. 2872, certify:

That the foregoing deposition of  
PETER ALEXANDER, Ph.D. was taken before me at the time  
and place therein set forth, at which time the witness  
was put under oath by me;

That the testimony of the witness and all  
objections made at the time of the deposition were  
recorded stenographically by me and were thereafter  
reduced to a computerized transcript under my direction;

That the foregoing transcript is a true record  
of the testimony of the witness and of all objections  
and colloquy made at the time of the deposition.

I further certify that I am neither counsel for  
nor related to any party to said action nor in anywise  
interested in the outcome thereof.

IN WITNESS WHEREOF, I have subscribed my name  
this 19th day of October, 2012.

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BEVERLY L. NEWMAN, CSR No. 2872